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January 19, 2017

Via Electronic Case Filing
Magistrate Judge Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: McCoy v. Desoremau & Neve
Docket No.: 16-CV-01636 (AMD) (VMS)
Status Report and Request to Extend Stay

Dear Magistrate Scanlon:

We are the attorneys for defendant, Sasha Neve, in the above-referenced action. We write this letter in furtherance of the Court's order dated December 19, 2016, to update the Court on the status of the parallel criminal proceeding related to this matter. Co-defendant Desoremeau hereby joins in this letter as well.

Since our last conference, both the New York County District Attorney and Queens County District Attorney have indicated that they have begun or are imminently beginning to present these matters to a Grand Jury. Thus, we have every reason to believe that we will either have an indictment, or a no true bill, very shortly.

Based on the foregoing, defendants respectfully request that the temporary stay of this proceeding be continued pending the Grand Jury proceeding. We respectfully suggest that defendants be allowed to submit a status report to the Court within thirty days, by February 21, 2017, to update your Honor on such proceedings. Plaintiff's counsel, Gabriel Harris, consents to the extension.

January 19, 2017

Re: McCoy v. Desormeau and Neve

Page 2

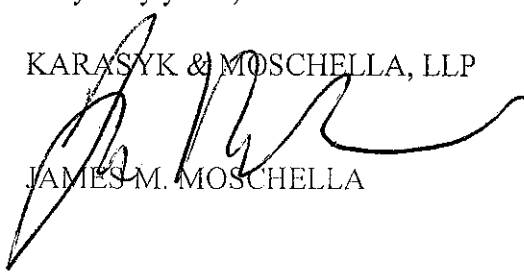
Accordingly, it is requested that the stay be extended to February 21, 2017, and defendants update the Court by such date.

Thank you for your consideration of this matter.

Very truly yours,

KARASYK & MOSCHELLA, LLP

JAMES M. MOSCHELLA



cc: All counsel - via electronic case filing